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16

17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA**

19  
20 J. P., by and through his Guardian  
Ad Litem, SHANNON VILLANUEVA

21 Plaintiffs,

22 v.

23 COUNTY OF ALAMEDA, DIANE DAVIS  
MAAS, SUE MAY, TRIAD FAMILY  
24 SERVICES, MARIA REFUGIO MOORE,  
and DOES 1-30, inclusive.

25 Defendants.  
26  
27  
28

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COUNTY OF ALAMEDA,  
DIANE DAVIS MAAS, & SUE MAY

Case No: 4:17-cv-05679-YGR

**STIPULATION AND ~~PROPOSED~~  
ORDER TO AMEND STIPULATED  
PROTECTIVE ORDER, DKT. 51**

Date Action Filed: October 2, 2017  
Trial Date: April 29, 2019

1 Plaintiffs J.P., by and through his Guardian Ad Litem, Shannon Villanueva (“Plaintiff”)  
2 and Defendants TRIAD FAMILY SERVICES, MARIA REFUGIO MOORE, COUNTY OF  
3 ALAMEDA, DIANE DAVIS MAAS, SUE MAY (collectively “Defendants”), jointly submit this  
4 Stipulation and [Proposed] Order seeking additional relief as permitted by Section 12.1 in the  
5 Stipulated Protective Order, Dkt. 51, as follows.

6 1. The parties stipulated to and this Court entered a Stipulated Protective Order, Dkt. 51,  
7 on March 16, 2018.

8 2. Defendants TRIAD and MOORE deposed the plaintiff on September 5, 2018 during  
9 which time the parties met and conferred and realized that the Stipulated Protective Order did not  
10 include several before-believed proper recipients of confidential information and documents if  
11 they were to agree to and execute Attachment A to Dkt. 51.

12 3. For example, plaintiff will be deposing a former employee of TRIAD on September 13,  
13 2018. Yet the Stipulated Protective Order does not include the parties or former employees of the  
14 parties who agree to be subject to the Protective Order by executing Attachment A to Dkt. 51.

15 4. Another example relates to the parties’ agreement to participate in a settlement  
16 conference with Magistrate Judge Laurel Beeler on September 25, 2018. The parties will need to  
17 share confidential information and documents including exhibits and testimony relating to the  
18 plaintiff’s damages with claims adjusters, parties, insureds, and other decision makers.

19 5. The parties agree that, by consenting to the filing of this stipulation, the County  
20 Defendants are not violating the stay (Docket #68) or otherwise submitting to the jurisdiction of  
21 the district court on Plaintiff’s claims against them.

22 6. Accordingly, the parties hereby stipulate and jointly request this Court expand the scope  
23 of the Protective Order to grant further relief to allow confidential information and documents be  
24 shared with parties, former employees of the parties, claims adjusters, insureds, and settlement  
25 decision makers who agree to be subject to the Protective Order by executing Attachment A to  
26 Dkt. 51.

1 Dated: September 11, 2018

**LAW OFFICES OF DAREN KESSLER**

2 By: /s/ Darren J. Kessler

3 Darren J. Kessler  
4 Attorney for Plaintiffs J. P., by and through his  
GAL, SHANNON VILLANUEVA

5 Dated: September 11, 2018

**SCOTT LAW FIRM**

6 By: /s/ Lizabeth N. de Vries

7 Lizabeth N. de Vries  
8 Attorney for Plaintiffs J. P., by and through his  
GAL, SHANNON VILLANUEVA

9 Dated: September 11, 2018

**MATHENY SEARS LINKERT JAIME LLP**

10 By: /s/Ronald E. Enabnit

11 Ronald E. Enabnit  
12 Attorney for Defendant TRIAD FAMILY  
SERVICES

13 Dated: September 11 2018

**GAVIN, CUNNINGHAM & HUNTER**

14 By: /s/ Alan Hunter

15 Alan Hunter, Elizabeth Landes  
16 Attorney for Defendant  
MARIA REFUGIO MOORE

17 Dated: September 11, 2018

**HAAPALA, THOMPSON & ABERN, LLP**

18 By: /s/Rebecca S. Widen

19 Rebecca S. Widen  
20 Attorney for Defendants COUNTY OF  
ALAMEDA, DIANE DAVIS MAAS, &  
SUE MAY

21 **ELECTRONIC CASE FILING ATTESTATION**

22 I, Lizabeth N. de Vries, am the ECF user whose identification and password are being  
23 used to file the foregoing documents. Pursuant to Civil Local Rule 5.1(i), I hereby attest that  
24 concurrence in the filing of these documents has been obtained from each of its signatories.

25 Dated: September 11, 2018

**SCOTT LAW FIRM**


26 By: /s/ Lizabeth N. de Vries

27 Lizabeth N. de Vries  
28 Attorneys for Plaintiff

**PURSUANT TO STIPULATION,**

The Court hereby finds good cause and hereby orders that the Stipulated Protective Order at Dkt. 51 is expanded to allow confidential information and documents be shared with the parties, former employees of the parties, claims adjusters, insureds, and settlement decision makers who agree to be subject to the Protective Order by executing Attachment A to Dkt. 51, e-filed in this matter on March 16, 2018.

DATED: September 13, 2018

  
Hon. Yvonne Gonzalez Rogers  
United States District Judge